

Exhibit A

IN THE CIRCUIT COURT OF HOLMES COUNTY, MISSISSIPPI

MELISSA ANTZ, INDIVIDUALLY AND IN
HER CAPACITY AS ADMINISTRATRIX OF
THE ESTATE OF EDWARD REDMOND, DECEASED

PLAINTIFF (S)

VS.

CIVIL NO. 2013-0230

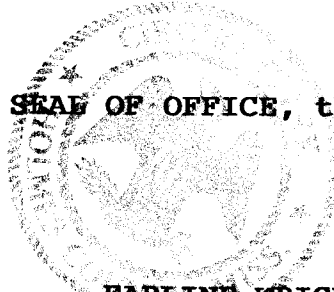
HOLMES COUNTY, MISSISSIPPI
HOLMES COUNTY SHERIFF WILLIE E. MARCH
IN HIS OFFICIAL CAPACITY,
UNKNOWN SHERIFF'S DEPUTIES 1-10

DEFENDANT (S)

CERTIFICATION

I, Earline Wright Hart, Clerk of the Circuit Court of
Holmes County, Mississippi, do hereby certify that the following
pleadings are copies of the original documents filed in the above
styled and numbered cause.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, this the 18th day
of November, 2013.



EARLINE WRIGHT HART, CIRCUIT CLERK
HOLMES COUNTY, MISSISSIPPI

BY: Brenda Travis D.C.

ORIGINAL

IN THE CIRCUIT COURT OF HOLMES COUNTY, MISSISSIPPI

MELISSA ANTZ, INDIVIDUALLY AND IN
HER CAPACITY AS ADMINISTRATRIX OF
THE ESTATE OF EDWARD REDMOND, DECEASED

PLAINTIFF

V.

CIVIL ACTION NO.: 2013-0230

HOLMES COUNTY, MISSISSIPPI,
HOLMES COUNTY SHERIFF WILLIE E. MARCH
IN HIS OFFICIAL CAPACITY,
UNKNOWN SHERIFF'S DEPUTIES 1-10,
IN THEIR OFFICIAL CAPACITIES

DEFENDANTS

COMPLAINT

COMES NOW, Plaintiff Melissa Antz, individually and as Administratrix of the Estate of Edward Redmond, Deceased, by and through the undersigned counsel, and files this her *Complaint* against Defendants Holmes County, Mississippi, Holmes County Sheriff Willie E. March, in his official capacity, and Unknown Holmes County Sheriffs Deputies 1-10, in their official capacities. In support thereof, Plaintiff would state as follows:

1. Plaintiff Melissa Antz, as Administratrix of the Estate of Edward Redmond, Deceased, is an adult resident citizen of the State of California residing at 3320 Esmond Avenue, Richmond, California 94804.
2. Defendant Holmes County is a governmental entity of the state of Mississippi. The Defendant may be served with process through its registered agent, Chancery Clerk Henry Luckett, 2 Court Square, Lexington, Mississippi 39095.
3. Defendant Holmes County Sheriff Willie E. March may be served with process at his place of employment, 23240 Highway 12, Lexington, Mississippi 39095.
4. All unknown Defendant Sheriff's Deputies may be served with process at their place

complaint

1

FILED

A.M. or P.M. 3:00

OCT 15 2013

EARLINE WRIGHT-HART, CIRCUIT CLERK

BY Brenda May D.C.

of employment, 23240 Highway 12, Lexington, Mississippi 39095.

5. Jurisdiction and venue of this action is proper in this Court under Miss. Code Ann. §§11-46-13 and 11-7-13, and 42 U.S.C. §§ 1983 and 1988.

6. Further, the actions complained of constitute arbitrary governmental action in violation of the Fourth, Fifth and Fourteenth Amendments to the United States Constitution.

7. On or about the early morning of Monday, October 15, 2012, the live-in companion of Edward Redmond contacted the Holmes County Sheriff's Department because Mr. Redmond was having an apparent psychotic episode and she needed help with him because she was afraid he was going to hurt himself. Mr. Redmond had been walking around outside in the early morning hours, but when the sheriff's department arrived, among other bizarre behavior, he was looking under the couch and opening and closing windows. The sheriff's deputy asked Mr. Redmond if he wanted to go to the hospital but Mr. Redmond was confused and declined the request.

8. Shortly thereafter, Mr. Redmond himself called the sheriff's department and, upon information and belief, he was home alone when the sheriff's deputy arrived. The deputy left the residence without taking any action.

9. Mr. Redmond called the Sheriff's Department a second time, which was the third call made to the Sheriff's Department that night, and a deputy came to the home and transported Mr. Redmond and his live-in companion to the Holmes County Jail.

10. Upon arrival at the Holmes County Jail, Mr. Redmond informed the sheriff's deputy that he was now ready to go to the hospital. The Sheriff's Department took Mr. Redmond's live-in companion back home and instead of transporting Mr. Redmond to the hospital as he requested and needed, they unlawfully placed him in the Holmes County Jail.

11. Mr. Redmond had a history of mental illness and upon information and belief, had

been using drugs, all of which was known to the Holmes County Sheriff's Department.

12. Rather than placing Mr. Redmond under suicide watch and/or delivering him to a medical facility, the Sheriff's Department placed him in a regular cell, with a regular jumpsuit, bed, etc.

13. Mr. Redmond committed suicide on the morning of Tuesday, October 16, 2012.

14. The Defendants were at all times acting under the color of state law and within the scope of their employment.

15. Plaintiff would show that all times material herein, the Defendants had a duty to:

- a. adopt and implement adequate guidelines, policies and procedures for Edward Redmond and others similarly situated so as to prevent injuries and death;
- b. provide adequate training to officers regarding how to respond and monitor individuals with suicidal tendencies;
- c. to not falsely arrest and/or imprison Edward Redmond;

16. The Defendants failed in all the above-stated duties owed to the Plaintiff. These failures constitute a reckless disregard for the safety of Edward Redmond on the part of the Defendants. The Defendants collectively breached each of these duties, proximately causing or contributing to the death of Edward Redmond.

17. As a result of the Defendants acting in reckless disregard of the safety and well-being of Edward Redmond, which resulted in his death on October 16, 2012, Plaintiff herein is entitled to recover the following damages:

- a. the amount of funeral expenses as a result of the death of Edward Redmond;
- b. damages for pain and suffering, both physical and mental, and loss of society and companionship;
- c. loss of the value of enjoyment of life suffered by the decedent during the

conscious suffering by him;

- d. value of the lost wages incurred due to the death of Edward Redmond; and,
- d. all such other damages as may be allowable.

18. The Defendants also violated Edward Redmond's constitutional rights.

19. In violation of Mr. Redmond's rights pursuant to 42 U.S.C. § 1983, the Defendants' unlawfully arrested Mr. Redmond.

20. As a result of Defendants' unlawful arrest, Mr. Redmond was subjected to an unreasonable seizure, a clear deprivation of his Fourth and Fourteenth Amendment rights. Mr. Redmond had not committed any violations of the law at the time of his arrest.

21. In violation of Mr. Redmond's rights pursuant to 42 U.S.C. § 1983, the Defendants' failed to provide Mr. Redmond with protection from his known suicidal impulses.

22. Defendant Holmes County's customs and/or policies caused the Holmes County jail staff to deprive Mr. Redmond of reasonable medical protection from his own suicidal tendencies.

23. The Defendants were deliberately indifferent to the obvious likely consequences of not adopting an adequate policy for detainees with known suicidal tendencies.

24. As a result of the Defendants' failures, Mr. Redmond suffered deprivation of his Fourth and Fourteenth Amendment rights.

25. In violation of Mr. Redmond's rights pursuant to 42 U.S.C. § 1983, he was unlawfully detained in a Holmes County jail cell.

26. As a proximate cause of the Defendants' unlawful detention and confinement, Mr. Redmond was deprived of his liberty in violation of his Fifth and Fourteenth Amendment rights.

27. As a result of the Defendants' deprivation of Mr. Redmond's constitutionally protected liberty interests, which led to his wrongful death, the Plaintiff suffered mental anguish and the

loss of society and companionship.

WHEREFORE PREMISES CONSIDERED, the Plaintiff demands judgment for the causes of action listed herein for special, punitive, and compensatory damages, plus the costs of this action, including attorney's fees, and such other relief this Court deems just and equitable.

Respectfully submitted, this the 15th day of October, 2013.

MELISSA ANTZ, INDIVIDUALLY AND AS
ADMINISTRATRIX OF THE ESTATE OF EDWARD
REDMOND, DECEASED, PLAINTIFF

By: _____

FELECIA PERKINS, ESQ.

Mississippi Bar Number 10078

JESSICA AYERS, ESQ.

Mississippi Bar Number 103685

LAW OFFICE OF FELECIA PERKINS, P. A.

P.O. Box 21

Jackson, Mississippi 39205-0021

Office: (601) 352-5053

Facsimile: (601) 355-0173

Counsel for Plaintiff

FILED
A.M. or P.M. 3:00
OCT 15 2013
EARLINE WRIGHT-HART, CIRCUIT CLERK
BY _____ D.C.

COPY

IN THE CIRCUIT COURT OF HOLMES COUNTY, MISSISSIPPI

MELISSA ANTZ, INDIVIDUALLY AND IN HER CAPACITY AS
ADMINISTRATRIX OF THE ESTATE OF
EDWARD REDMOND, DECEASED

PLAINTIFF

V.

CIVIL ACTION NO.: _____

HOLMES COUNTY, MISSISSIPPI,
HOLMES COUNTY SHERIFF WILLIE E. MARCH
IN HIS OFFICIAL CAPACITY,
UNKNOWN SHERIFF'S DEPUTIES 1-10,
IN THEIR OFFICIAL CAPACITIES

DEFENDANTS

SUMMONS

NOTICE TO DEFENDANT(S)

TO: Holmes County, Mississippi
c/o Henry Lockett
Holmes County Chancery Clerk
2 Court Square
Lexington, Mississippi 39095

**THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT
AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.**

You are required to mail or hand-deliver a copy of a written response to the Complaint to FELECIA PERKINS, ESQ., the attorney for the Plaintiff(s) whose address is 170 E. Griffith, Suite 178-B, Jackson, Mississippi 39201 and mailing address is P.O. Box 21, Jackson, Mississippi 39205. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this Summons and Complaint, or a judgment by default will be entered against you for money or other things demanded in the Complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

ISSUED under my hand and seal of this Court, this ____ day of October, 2013.

Earline Wright Hart, Clerk
Holmes County Circuit Court

(Seal)

By: _____, D.C.

PREPARED BY:
FELECIA PERKINS, ESQ.
Mississippi Bar Number 10078
LAW OFFICE OF FELECIA PERKINS, P. A.
P. O. Box 21
Jackson, Mississippi 39205-0021
(601) 352-5053

COPY

IN THE CIRCUIT COURT OF HOLMES COUNTY, MISSISSIPPI

MELISSA ANTZ, INDIVIDUALLY AND IN HER CAPACITY AS
ADMINISTRATRIX OF THE ESTATE OF
EDWARD REDMOND, DECEASED

PLAINTIFF

V.

CIVIL ACTION NO.: _____

HOLMES COUNTY, MISSISSIPPI,
HOLMES COUNTY SHERIFF WILLIE E. MARCH
IN HIS OFFICIAL CAPACITY,
UNKNOWN SHERIFF'S DEPUTIES 1-10,
IN THEIR OFFICIAL CAPACITIES

DEFENDANTS

SUMMONS

NOTICE TO DEFENDANT(S)

TO: Sheriff Willie E. March
Holmes County Sheriff Dept.
23240 Hwy 12
Lexington, Mississippi 39095

**THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT
AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.**

You are required to mail or hand-deliver a copy of a written response to the Complaint to FELECIA PERKINS, ESQ., the attorney for the Plaintiff(s) whose address is 170 E. Griffith, Suite 178-B, Jackson, Mississippi 39201 and mailing address is P.O. Box 21, Jackson, Mississippi 39205. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this Summons and Complaint, or a judgment by default will be entered against you for money or other things demanded in the Complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

ISSUED under my hand and seal of this Court, this ____ day of October, 2013.

Earline Wright Hart, Clerk
Holmes County Circuit Court

(Seal)

By: _____, D.C.

PREPARED BY:
FELECIA PERKINS, ESQ.
Mississippi Bar Number 10078
LAW OFFICE OF FELECIA PERKINS, P. A.
P. O. Box 21
Jackson, Mississippi 39205-0021
(601) 352-5053

COVER SHEET**Civil Case Filing Form**(To be completed by Attorney/Party
Prior to Filing of Pleading)Mississippi Supreme Court Form AOC/01
Administrative Office of Courts (Rev 2009)**Court Identification Docket #**

26	1	C7
County #	Judicial District	Court ID (CH, CI, CO)
10	15	13
Month	Date	Year

This area to be completed by clerk

Case Year

2013

Docket Number00230
035
Local Docket ID

Case Number if filed prior to 1/1/94

In the CIRCUITCourt of HOLMES

County —

Judicial District

Origin of Suit (Place an "X" in one box only)

- ☒ Initial Filing ☐ Reinstated ☐ Foreign Judgment Enrolled ☐ Transfer from Other court ☐ Other
☐ Remanded ☐ Reopened ☐ Joining Suit/Action ☐ Appeal

Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate FormIndividual AntzMelissaRedmond

Last Name

First Name

Maiden Name, if applicable

M.I.

Jr/Sr/III/IV

- ☒ Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of Edward Redmond, Deceased

- ☐ Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:
 D/B/A or Agency _____

Business

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated

- ☐ Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below:
 D/B/A _____

Address of PlaintiffAttorney (Name & Address) Felecia Perkins, P.O. Box 21, Jackson, MS 39205MS Bar No. 10078

- ☐ Check (x) if Individual Filing Initial Pleading is NOT an attorney

Signature of Individual Filing: _____

Defendant - Name of Defendant - Enter Additional Defendants on Separate Form

Individual

Last Name

First Name

Maiden Name, if applicable

M.I.

Jr/Sr/III/IV

- ☐ Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of _____

- ☐ Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:
 D/B/A or Agency _____

Business Holmes County, Mississippi

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated

- ☐ Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below:
 D/B/A _____

Attorney (Name & Address) - If Known

MS Bar No. _____

Damages Sought:

Compensatory \$ _____

Punitive \$ _____

Check (x) if child support is contemplated as an issue in this suit.*

*If checked, please submit completed Child Support Information Sheet with this Cover Sheet

Nature of Suit (Place an "X" in one box only)

Domestic Relations	Business/Commercial	Children/Minors - Non-Domestic	Real Property
<input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____	<input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____	<input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion Minor <input type="checkbox"/> Removal of Minority <input type="checkbox"/> Other _____	<input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____
Appeals	Probate	Civil Rights	Torts
<input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other _____	<input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Other _____	<input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input type="checkbox"/> Other _____	<input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input checked="" type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____
		Contract	
		<input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____	
		Statutes/Rules	
		<input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____	

IN THE CIRCUIT COURT OF HOLMES COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF

Docket No. _____
 File Yr _____ Chronological No. _____ Clerk's Local ID _____

Docket No. If Filed
 Prior to 1/1/94 _____

DEFENDANTS IN REFERENCED CAUSE - Page 1 of _____ Defendants Pages
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Defendant #2:

Individual: March Willie (_____) E
 Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #3:

Individual: Does 1-10 John (_____) _____
 Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #4:

Individual: _____ (_____) _____
 Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____